

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

<b>PERRY CLINE, on behalf of</b>	)	
<b>himself and all others</b>	)	
<b>similarly situated,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 17-cv-313-JAG</b>
	)	
<b>SUNOCO, INC. (R&amp;M)</b>	)	
<b>and SUNOCO PARTNERS</b>	)	
<b>MARKETING &amp; TERMINALS, L.P.,</b>	)	
	)	
<b>Defendants.</b>	)	

**NOTICE TO COURT**

Earlier today, Sunoco filed a Motion for Administrative Stay in the Tenth Circuit Court of Appeals, seeking a stay of the enforcement proceedings directed by this Court. *See* Exhibit 1. In it, Sunoco alleged this Court has “not shown any inclination to grant even a modest reprieve” from enforcement and contended it “must produce wide-ranging documentation and information regarding [its] assets.” Mot. at 2. Nowhere in Sunoco’s Motion did it reference the generous 60-day stay on execution imposed by the Court to allow for mediation (when it did not have to), nor did it note Judge West’s Order wherein she clearly stated the information at issue was of the type normally sought in enforcement proceedings under Oklahoma law. The Tenth Circuit, however, promptly denied Sunoco’s Motion on the basis it failed its burden to show that a stay or injunction was warranted under the relevant factors. *See* Exhibit 2.

Sunoco notably filed the Motion after Class Representative responded to its Objection in this Court. The Motion, along with Sunoco's threat to seek further relief in the Supreme Court, is yet another example of its intent to not comply with Judge West's Order and, as Class Representative has contended all along, of its ongoing intent to never pay the Final Judgment unless Class Counsel follows through with enforcement proceedings.

DATED: August 25, 2022.

Respectfully submitted,

/s/Bradley E. Beckworth

Bradley E. Beckworth, OBA No. 19982

Jeffrey Angelovich, OBA No. 19981

Andrew G. Pate, OBA No. 34600

Trey Duck, OBA No. 33347

**NIX PATTERSON, LLP**

8701 Bee Cave Road

Building 1, Suite 500

Austin, TX 78746

Telephone: (512) 328-5333

Facsimile: (512) 328-5335

*bbeckworth@nixlaw.com*

*jangelovich@nixlaw.com*

*dpate@nixlaw.com*

*tduck@nixlaw.com*

Susan Whatley, OBA No. 30960

**NIX PATTERSON, LLP**

P.O. Box 178

Linden, Texas 75563

Telephone: (903) 215-8310

*swhatley@nixlaw.com*

Patrick M. Ryan, OBA No. 7864  
Phillip G. Whaley, OBA No. 13371  
Jason A. Ryan, OBA No. 18824  
Paula M. Jantzen, OBA No. 20464  
**RYAN WHALEY COLDIRON JANTZEN PETERS  
& WEBBER PLLC**  
400 N. Walnut Ave.  
Oklahoma City, OK 73104  
Telephone: 405-239-6040  
Facsimile: 405-239-6766  
*pryan@ryanwhaley.com*  
*pwhaley@ryanwhaley.com*  
*jryan@ryanwhaley.com*  
*pjantzen@ryanwhaley.com*

Michael Burrage, OBA No. 1350  
**WHITTEN BURRAGE**  
512 N. Broadway Ave., Suite 300  
Oklahoma City, OK 73103  
Telephone: (405) 516-7800  
Facsimile: (405) 516-7859  
*mburrage@whittenburragelaw.com*

Robert N. Barnes, OBA No. 537  
Patranell Lewis, OBA No. 12279  
Emily Nash Kitch, OBA No. 22244  
**BARNES & LEWIS, LLP**  
208 N.W. 60th Street  
Oklahoma City, OK 73118  
Telephone: (405) 843-0363  
Facsimile: (405) 843-0790  
*rbarnes@barneslewis.com*  
*plewis@barneslewis.com*  
*ekitch@barneslewis.com*

Lawrence R. Murphy, Jr., OBA No. 17681  
**SMOLEN LAW, PLLC**  
611 South Detroit Avenue  
Tulsa, Oklahoma 74120  
Telephone: (918) 777-4529  
Facsimile: (918) 890-4529  
*larry@smolen.law*

**CLASS COUNSEL**

**CERTIFICATE OF SERVICE**

I hereby certify that I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send email notification of such filing to all registered parties.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: August 25, 2022.

/s/ Bradley E. Beckworth  
Bradley E. Beckworth